

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
AHMED MOHAMED,

Plaintiff,

-against-

METROPOLITAN LIFE INSURANCE  
COMPANY,

Defendant.  
-----X

Docket No.:  
10 CIV 7249 (PKC)

**DECLARATION OF  
MATTHEW HALLFORD**

I, Matthew Hallford, pursuant to 28 U.S.C. §1746(2), declare under penalty of perjury the following:

1. I am a Litigation Specialist at Metropolitan Life Insurance Company (“MetLife”). As part of my responsibilities for MetLife, I am familiar with the procedures for processing and administering claims for disability benefits under group benefit plans, including the Credit Suisse Disability Benefits Plan (the “Plan”) and specifically including plaintiff Ahmed Mohamed’s claims at issue herein. I am personally familiar with the manner in which MetLife maintains files and records, including those that relate to claims for benefits under the Plan.

2. This Declaration is respectfully submitted in support of MetLife’s Motion for an Order dismissing plaintiff’s complaint.

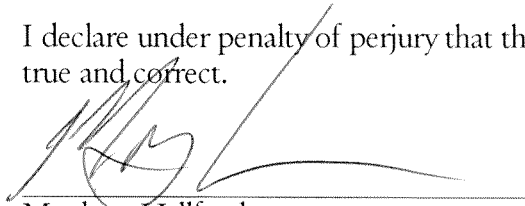
3. A true and correct copy of “Your Benefit Plan, Credit Suisse First Boston Corporation, Long Term Disability. Effective January 1, 2002;” is annexed hereto as **Exhibit “A”** and Bates Stamped “MOHAMED 000001” to “MOHAMED 000062.”

4. A true and correct copy of the “Credit Suisse Disability Benefits Summary Plan Description. Effective January 1, 2007;” is annexed hereto as **Exhibit “B”** and Bates Stamped “MOHAMED 000063” to “MOHAMED 000108.”

5. Annexed hereto as **Exhibit “C”** is a true and correct copy of the documents contained in MetLife’s administrative claim file pertaining to Ahmed Mohamed’s long term disability benefits claim, Bates Stamped “MOHAMED 000109” to “MOHAMED 000893”, which is maintained by MetLife in the normal and ordinary course of business.

Dated: May 31, 2011

I declare under penalty of perjury that the foregoing is true and correct.

  
Matthew Hallford

**CERTIFICATE OF SERVICE**

I, Matthew P. Mazzola, hereby certify and affirm that a true and correct copy of the attached **DECLARATION OF MATTHEW HALLFORD, with exhibits,** was served **via ECF and regular mail** on June 8, 2011, upon the following:

Michael Yoeli, Esq.  
YOELI GOTTLIEB & ETRA LLP  
260 Madison Avenue, 18<sup>th</sup> Floor  
New York, New York 10016  
Tel.: (212) 472-7270  
*Attorneys for Plaintiff*

Dated: New York, New York  
June 8, 2011

s/  
\_\_\_\_\_  
Matthew P. Mazzola (MM-7427)